

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SCOTT KIMBALL , ON BEHALF OF HIMSELF AND ALL  
OTHERS SIMILARLY SITUATED,

PLAINTIFF,

VS.

MBNA CORP., BRUCE L. HAMMONDS, KENNETH A.  
VECCHIONE, RICHARD K. STRUSTHER, CHARLES C.  
KRULAK, JOHN R. COCHRAN, III, MICHAEL G.  
RHODES, LANCE L. WEAVER AND JOHN W.  
SCHEFLEN,

DEFENDANTS.

Case No. 1:05-cv-04725-KMK

VIRGINIA McMATH, ON BEHALF OF HERSELF AND  
ALL OTHERS SIMILARLY SITUATED,

PLAINTIFF,

VS.

MBNA CORP., BRUCE L. HAMMONDS, KENNETH A.  
VECCHIONE, RICHARD K. STRUSTHER, CHARLES C.  
KRULAK, JOHN R. COCHRAN, III, MICHAEL G.  
RHODES, LANCE L. WEAVER AND JOHN W.  
SCHEFLEN,

DEFENDANTS.

Case No. 1:05-cv-05168-KMK

**NOTICE OF MOTION OF THE KIMBALL MOVANTS FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,  
AND FOR APPROVAL OF SELECTION OF CO-LEAD COUNSEL**

Scott Kimball, Virginia McMath, M.B. Kajbafnezhad, James Moran and Nancy Kisha Moran  
(the “Kimball Movants” or “Movants”), by their counsel, hereby move this Court on a date and at

such time as may be designated by the Court for an Order (a proposed form of which is attached hereto) consolidating the above-captioned actions with respect to all claims brought under the Securities Exchange Act of 1934 (the “Actions”); appointing Movants as Lead Plaintiffs pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and approving Movants’ selection of the Law Offices of Curtis V. Trinko, LLP and the Law Office of Alfred G. Yates Jr., PC as Co-Lead Counsel for the Actions.

This motion is made on the grounds that Movants are the most adequate lead plaintiffs to represent the interests of the purchasers of MBNA Corp. (“MBNA” or the “Company”), having suffered losses of \$35,513.08 from the purchase of such shares between January 20, 2005 and April 21, 2005 (“Class Period”). In addition, Movants meet the requirements of Federal Rule of Civil Procedure 23 because their claims are typical of class members’ claims, and they will fairly and adequately represent the class. Finally, Movants have selected and retained Law Offices of Curtis V. Trinko, LLP and the Law Office of Alfred G. Yates Jr., PC as Co-Lead Counsel for the Actions, law firms with substantial experience in prosecuting securities fraud class actions.

This motion is based on the supporting memorandum of points and authorities, the Declaration of Curtis V. Trinko (“Trinko Decl.”) in support thereof, the pleadings, other files and records in each of these actions, and such other written or oral argument as may be presented to the Court.

DATED: July 5, 2005

**LAW OFFICES OF CURTIS V. TRINKO, LLP**

By:                     /S                      
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***Proposed Co-Lead Counsel***